To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 26 Jun 20 17:44 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

By way of introduction, my name is Patrick Halley, and I coordinate the efforts of USTelecom's Industry Traceback Group (ITG). We are writing to request your assistance on industry efforts to protect consumers from fraudulent, abusive or potentially unlawful robocalls. My contact information is listed below, and I would be more than happy to discuss this request with you over the phone.

A member of USTelecom's ITG recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin (call details with date(s) are listed below). We request that you assist industry stakeholders who are engaging in traceback efforts in order to help identify the source of this potentially fraudulent, abusive or unlawful network traffic. To assist us in our efforts, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now.

USTelecom, a 501(c)(6) trade association, represents service providers and suppliers for the telecommunications industry and leads the ITG, a collaborative effort of companies from across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls. The ITG coordinates with carriers at all levels within the call path seeking to identify the source of and eliminate illegal robocall traffic. The ITG also coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. For more information of about the ITG or a list of the current members, see USTelecom's website.

The ITG operates under the auspices of the Communications Act which permit telecommunications carriers to disclose and/or permit access to Customer Proprietary Network Information. Section 222(d)(2) of the Communications Act permits telecommunications carriers to share such information in order to "protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services." In addition, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

The Federal Communications Commission's (FCC) Enforcement Bureau has sent letters to carriers that have been non-responsive to ITG traceback requests. The letters "urge" carriers to "to cooperate with the USTelecom Industry Traceback Group's program aimed at identifying the source of illegal robocalls and harmful spoofed calls." The ITG has received recognition at all levels of government, including the FCC, the Federal Trade Commission (FTC) and all 50 State Attorneys General.

We are asking that you submit your response to this inquiry via our secure on-line portal, where you can see additional detail about all traceback requests involving your network. With respect to the call details below, please provide us with the following:

- 1. Please investigate the source of this traffic and respond with the identity of the upstream carrier(s) that sent the traffic into your network, or if one of your end users originated the traffic, please identify that end user. We ask that you use the link below to access the portal and use the drop-down selector to provide this information.
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- 3. As you investigate this matter, please take appropriate action on your network to ensure compliance with applicable United States laws and regulations, and inform me of the action you have taken.

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Please feel free to consult with your counsel on this request, and do not hesitate to call 202-756-6999 or contact me via reply email should you have any questions, or would like to discuss.

Best Regards,

Patrick Halley Senior Vice President, Policy & Advocacy USTelecom – The Broadband Association 601 New Jersey Avenue NW, Suite 600 Washington, DC 20001

> Submit your response via our secure on-line portal: https://traceback.ustelecom.org/Form/Login/r;REDACTED?t=rqfexUkqd (URL is a private login; do not share.)

Call Details for Incident #2640 (new)

Date/Time: 2020-06-26 15:34:00 UTC

To: +14072223658 From: +14072613544

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not identified. Assorted toll-free numbers used as caller-ID.

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 30 Jun 20 07:38 UTC

USTELECOM

THE BROADBAND ASSOCIATION

This is a reminder regarding a recent request we sent for call detail information from the USTelecom Industry Traceback Group regarding a suspected illegal robocall.

Please use the link below to access the Traceback Secure Web Portal and fill in the requested information regarding the source of the call(s).

We would appreciate a response as quickly as possible; ideally in 4 hours or less and no longer than one business day.

For help or questions, email traceback-notice@ustelecom.org or call 202-756-6999.

Submit your response via our secure on-line portal:

https://traceback.ustelecom.org/Form/Login/r;REDACTED?t=rBDBBqmn3z

(URL is a private login; do not share.)

Call Details for Incident #2640 (3d13h ago)

Date/Time: 2020-06-26 15:34:00 UTC

To: +14072233658 From: +14072613544

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not identified. Assorted toll-free numbers used as caller-ID.

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 30 Jun 20 19:42 UTC

USTELECOM

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Best Regards,

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Submit your response via our secure on-line portal: https://traceback.ustelecom.org/Form/Login/r;REDACTED?t=tnhYXDv
(URL is a private login; do not share.)

Call Details for Incident #2659 (new)

Date/Time: 2020-06-30 16:41:00 UTC

To: +14053030584 From: +12109421156

Campaign: SSA-P1-BenefitsCanceled (GImpS)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of

similar calls. Originators please search your records for similar traffic.

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 30 Jun 20 20:07 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Best Regards,

Patrick Halley Senior Vice President, Policy & Advocacy USTelecom – The Broadband Association 601 New Jersey Avenue NW, Suite 600 Washington, DC 20001

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(URL is a private login; do not share.)

Call Details for Incident #2644 (new)

Date/Time: 2020-06-26 14:32:00 UTC

To: +15016818212 From: +15016815568

Campaign: USTreas-EnforcementAction-GImp

FRAUD. Claims to be from US Treasury regarding an enforcement action. Impersonates a government official. Recorded/automated voice to wireless numbers generally prohibited. Random spoofing of Caller-ID. Blocking

the ANI is not effective.

Call Details for Incident #2659 (25m ago)

Date/Time: 2020-06-30 16:41:00 UTC

To: +14053030584 From: +12109421156

Campaign: SSA-P1-BenefitsCanceled (GImpS)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of

similar calls. Originators please search your records for similar traffic.

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 08 Jul 20 20:01 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Incident #2708 (new)

Date/Time: 2020-07-08 15:46:00 UTC

To: +15756492707 From: +19152453792

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not identified. Assorted toll-free numbers used as caller-ID.

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 08 Jul 20 20:07 UTC

USTELECOM

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Call Details for Incident #2709 (new)

Date/Time: 2020-07-08 15:46:00 UTC

To: +15752022683

From: +19152453792

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not identified. Assorted toll-free numbers used as caller-ID.

Call Details for Incident #2708 (6m ago)

Date/Time: 2020-07-08 15:46:00 UTC

To: +15756492707 From: +19152453792

Campaign: Utility-30MinDisconnect

(see description above)

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 08 Jul 20 20:07 UTC

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- 3. As you investigate this matter, please take appropriate action on your network to ensure compliance with applicable United States laws and regulations, and inform me of the action you have taken.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream carriers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call 202-756-6999 or contact me via reply email should you have any questions, or would like to discuss.

Best Regards,

Patrick Halley Senior Vice President, Policy & Advocacy USTelecom – The Broadband Association 601 New Jersey Avenue NW, Suite 600 Washington, DC 20001

Submit your response via our secure on-line portal: https://traceback.ustelecom.org/Form/Login/r;REDACTED?t=anIIFN1K
(URL is a private login; do not share.)

Call Details for Incident #2709 (new)

Date/Time: 2020-07-08 15:46:00 UTC

To: +15752022683 From: +19152453792 Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to

make payment arrangements. Utility company is not identified. Assorted toll-free numbers used as caller-ID.

Call Details for Incident #2708 (6m ago)

Date/Time: 2020-07-08 15:46:00 UTC

To: +15756492707 From: +19152453792

Campaign: Utility-30MinDisconnect

(see description above)

To: jrolivarm@gmail.com, noc@smartbiztel.com

Date: 28 Jul 20 02:13 UTC

USTELECOM

THE BROADBAND ASSOCIATION

David Frankel from Industry Traceback Group has sent you the following message:

Smartbiz -- Please know that we tried to contact Chock Telecom at alejandro@chocktelecom.com regarding three tracebacks but they did not respond to our emails.

To respond, please leave a COMMENT using the link below.

Submit your response via our secure on-line portal: https://traceback.ustelecom.org/Form/Login/r;REDACTED?t=juwxWa&h=12482 (URL is a private login; do not share.)

To: noc@smartbiztel.com

Date: 24 Aug 20 20:43 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's Industry Traceback Group (ITG), a private-led and the FCC-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's rules, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls. My contact information is listed below, and I would be more than happy to discuss this request with you.

The ITG coordinates with carriers at all levels within the call path seeking to identify the source of and eliminate illegal robocall traffic. The ITG also coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. For more information about the ITG or a list of the current members, see the ITG website

An ITG participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with the TRACED Act and the FCC's rules, USTelecom's ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic. To assist us in our efforts, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now.

The ITG operates under the auspices of the Communications Act which permit telecommunications carriers to disclose and/or permit access to Customer Proprietary Network Information (CPNI). Section 222(d)(2) of the Communications Act permits telecommunications carriers to share such information in order to "protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services." The Federal Communications Commission (FCC) recently clarified that voice service providers that share certain information to combat robocalls do not violate CPNI obligations under the Communications Act and its rules. See FCC 20-96, ¶ 22.

The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See DA 20-785, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible."

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

We are asking that you submit your response to this inquiry via our secure on-line portal, where you can see additional detail about all traceback requests involving your network.

- 1. Please investigate the source of this traffic and respond with the identity of the upstream service provider(s) that sent the traffic into your network, or if one of your end users originated the traffic, please identify that end user. We ask that you use the link below to access the portal and use the drop-down selector to provide this information.
- 2. If, in investigating this traffic, the end user(s) originating the traffic are able to demonstrate to you that the traffic complies with applicable United States laws and regulations, please provide such information in the comments portion of the applicable traceback, including the identity of the customer and the customer's explanation of such traffic.
- 3. As you investigate this matter, please take appropriate action on your network to ensure compliance with applicable United States laws and regulations, and indicate what mitigation steps have been taken to prevent such suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to contact me via reply email should you have any questions, or would like to discuss.

Best Regards,

Josh Bercu Vice President, Policy & Advocacy USTelecom – The Broadband Association 601 New Jersey Avenue NW, Suite 600 Washington, DC 20001

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #2930 (new)

Date/Time: 2020-08-24 14:40 UTC

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 24 Aug 20 20:43 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's Industry Traceback Group (ITG), a private-led and the FCC-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's rules, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls. My contact information is listed below, and I would be more than happy to discuss this request with you.

The ITG coordinates with carriers at all levels within the call path seeking to identify the source of and eliminate illegal robocall traffic. The ITG also coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. For more information about the ITG or a list of the current members, see the ITG website

An ITG participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with the TRACED Act and the FCC's rules, USTelecom's ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic. To assist us in our efforts, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now.

The ITG operates under the auspices of the Communications Act which permit telecommunications carriers to disclose and/or permit access to Customer Proprietary Network Information (CPNI). Section 222(d)(2) of the Communications Act permits telecommunications carriers to share such information in order to "protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services." The Federal Communications Commission (FCC) recently clarified that voice service providers that share certain information to combat robocalls do not violate CPNI obligations under the Communications Act and its rules. See FCC 20-96, ¶ 22.

The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See DA 20-785, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible."

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

We are asking that you submit your response to this inquiry via our secure on-line portal, where you can see additional detail about all traceback requests involving your network.

- 1. Please investigate the source of this traffic and respond with the identity of the upstream service provider(s) that sent the traffic into your network, or if one of your end users originated the traffic, please identify that end user. We ask that you use the link below to access the portal and use the drop-down selector to provide this information.
- 2. If, in investigating this traffic, the end user(s) originating the traffic are able to demonstrate to you that the traffic complies with applicable United States laws and regulations, please provide such information in the comments portion of the applicable traceback, including the identity of the customer and the customer's explanation of such traffic.
- 3. As you investigate this matter, please take appropriate action on your network to ensure compliance with applicable United States laws and regulations, and indicate what mitigation steps have been taken to prevent such suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to contact me via reply email should you have any questions, or would like to discuss.

Best Regards,

Josh Bercu Vice President, Policy & Advocacy USTelecom – The Broadband Association 601 New Jersey Avenue NW, Suite 600 Washington, DC 20001

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #2930 (new)

Date/Time: 2020-08-24 14:40 UTC

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com

Date: 01 Sep 20 18:03 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

About the ITG and the Traceback Process

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The ITG operates under the auspices of the Communications Act which permit telecommunications carriers to disclose and/or permit access to Customer Proprietary Network Information (CPNI) under certain circumstances. Section 222(d)(2) of the Communications Act permits telecommunications carriers to share such information in order to "protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services." The FCC recently clarified that voice service providers that share certain information to combat robocalls do not violate CPNI obligations under the Communications Act and its rules. See FCC 20-96, ¶ 22.

The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

Responding to This Request

We are asking that you submit your response to this inquiry via our secure online portalWe are asking that you submit your response to this inquiry via our secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic, and we request that you investigate that traffic and provide us with the information listed below through the portal. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network, or if one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic is able to demonstrate to you that the traffic complies with applicable U.S. laws and regulations, in the portal's comments section for the applicable traffic, identity of the end user and provide a description of the traffic and the end user's explanation of why it complies with U.S. laws and regulations.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #2974 (new)

Date/Time: 2020-08-28 22:17 UTC

To: +16158531761 From: +13324567348

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Sep 20 18:03 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

About the ITG and the Traceback Process

The ITG coordinates with carriers at all levels within the call path seeking to identify the source of and eliminate illegal robocall traffic and eliminate such traffic. The ITG also coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. For more information about the ITG or a list of the current members, see the ITG website

The ITG operates under the auspices of the Communications Act which permit telecommunications carriers to disclose and/or permit access to Customer Proprietary Network Information (CPNI) under certain circumstances. Section 222(d)(2) of the Communications Act permits telecommunications carriers to share such information in order to "protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services." The FCC recently clarified that voice service providers that share certain information to combat robocalls do not violate CPNI obligations under the Communications Act and its rules. See FCC 20-96, ¶ 22.

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Responding to This Request

We are asking that you submit your response to this inquiry via our secure online portalWe are asking that you submit your response to this inquiry via our secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic, and we request that you investigate that traffic and provide us with the information listed below through the portal. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network, or if one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic is able to demonstrate to you that the traffic complies with applicable U.S. laws and regulations, in the portal's comments section for the applicable traffic, identity of the end user and provide a description of the traffic and the end user's explanation of why it complies with U.S. laws and regulations.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #2974 (new)

Date/Time: 2020-08-28 22:17 UTC

To: +16158531761 From: +13324567348

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com

Date: 11 Sep 20 11:45 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3041 (new)

Date/Time: 2020-09-08 20:33 UTC

To: +17077243424 From: +12027732811

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 11 Sep 20 11:45 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3041 (new)

Date/Time: 2020-09-08 20:33 UTC

To: +17077243424 From: +12027732811

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com

Date: 16 Sep 20 17:27 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3106 (new)

Date/Time: 2020-09-11 16:36 UTC

To: +19542708930 From: +19549446366

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 16 Sep 20 17:27 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Call Details for Traceback #3106 (new)

Date/Time: 2020-09-11 16:36 UTC

To: +19542708930 From: +19549446366

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com

Date: 23 Sep 20 19:51 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3148 (new)

Date/Time: 2020-09-22 18:26 UTC

To: +15033801432 From: +15036725400

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 23 Sep 20 19:51 UTC

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To: +15033801432 From: +15036725400

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com

Date: 25 Sep 20 12:58 UTC

USTELECOM

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3165 (new)

Date/Time: 2020-09-22 19:14 UTC

To: +19192800873 From: +19197032116

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

Date: 25 Sep 20 12:58 UTC

USTELECOM

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3165 (new)

Date/Time: 2020-09-22 19:14 UTC

To: +19192800873 From: +19197032116

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

To: noc@smartbiztel.com

Date: 25 Sep 20 15:37 UTC

USTELECOM

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Call Details for Traceback #3164 (new)

Date/Time: 2020-09-23 14:02 UTC

To: +19192800873 From: +19193487149

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

Date: 25 Sep 20 15:37 UTC

USTELECOM

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Call Details for Traceback #3164 (new)

Date/Time: 2020-09-23 14:02 UTC

To: +19192800873 From: +19193487149

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

To: noc@smartbiztel.com

Date: 25 Sep 20 15:55 UTC

USTELECOM

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Call Details for Traceback #3167 (new)

Date/Time: 2020-09-23 17:05 UTC

To: +17042800080 From: +17047621511

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

Date: 25 Sep 20 15:55 UTC

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To: noc@smartbiztel.com

Date: 25 Sep 20 17:49 UTC

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Date/Time: 2020-09-23 17:11 UTC

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Campaign: Utility-30MinDisconnect - NC

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3169 (new)

Date/Time: 2020-09-23 17:11 UTC

To: +17042800080 From: +17046091598

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

To: noc@smartbiztel.com

Date: 30 Sep 20 19:36 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3210 (new)

Date/Time: 2020-09-24 15:02 UTC

To: +15105206394 From: +19152680196

Campaign: USTreas-SSA-EnforceAction (GovtImpers)

FRAUD. Claims to be from US Treasury regarding an enforcement action. Impersonates a government official. Recorded/automated voice to wireless numbers generally prohibited. Random spoofing of Caller-ID. Blocking the ANI is not effective.

Date: 30 Sep 20 19:36 UTC

USTELECOM

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To: noc@smartbiztel.com

Date: 30 Sep 20 20:15 UTC

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(URL is a private login; do not share.)

Call Details for Traceback #3213 (new)

Date/Time: 2020-09-30 16:07 UTC

To: +15866152626 From: +15865546987

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

Date: 30 Sep 20 20:15 UTC

USTELECOM

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Date/Time: 2020-09-30 16:07 UTC

To: +15866152626 From: +15865546987

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com
Date: 03 Oct 20 09:55 UTC

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(URL is a private login; do not share.)

Call Details for Traceback #3242 (new)

Date/Time: 2020-09-30 16:52 UTC

To: +17082127770 From: +12125341961

Campaign: BofA - Chinese Voice Department

Confirmed fraudulent call, identifying the calling party as Bank of America's Chinese Voice Dept. Recorded voice in foreign language.

Date: 03 Oct 20 09:56 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3242 (new)

Date/Time: 2020-09-30 16:52 UTC

To: +17082127770 From: +12125341961

Campaign: BofA - Chinese Voice Department

Confirmed fraudulent call, identifying the calling party as Bank of America's Chinese Voice Dept. Recorded voice in foreign language.

To: noc@smartbiztel.com

Date: 06 Oct 20 16:31 UTC

USTELECOM

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3253 (new)

Date/Time: 2020-10-05 15:39 UTC

To: +12604501996 From: +14438898013

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

Date: 06 Oct 20 16:31 UTC

USTELECOM

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Call Details for Traceback #3253 (new)

Date/Time: 2020-10-05 15:39 UTC

To: +12604501996 From: +14438898013

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Oct 20 11:11 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3278 (new)

Date/Time: 2020-10-09 15:12 UTC

To: +18329745040 From: +16107707265

Campaign: Refund-ComputerServices

FRAUD. Recorded message claims that a computer services subscription renewal fee of 399 has been charged to your account. Recorded message to wireless number generally not allowed. Calling party must be identified in voice-mail. Claimed subscription does not exist. Call is FRAUD.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Oct 20 11:16 UTC

USTELECOM

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Call Details for Traceback #3281 (new)

Date/Time: 2020-10-09 19:18 UTC

To: +15854290867 From: +16318239445

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 12 Oct 20 14:47 UTC

USTELECOM

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Call Details for Traceback #3280 (new)

Date/Time: 2020-10-09 19:07 UTC

To: +14058378238 From: +16314928412

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 13 Oct 20 13:46 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3286 (new)

Date/Time: 2020-10-12 17:09 UTC

To: +12298699355 From: +17064746058

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 13 Oct 20 16:38 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3295 (new)

Date/Time: 2020-09-23 10:54 UTC

To: +19192803863 From: +19196444369

Campaign: Utility-30MinDisconnect - NC

Calls to Duke Energy Customers in North Carolina claiming to be Duke Energy and threatening to shut off recipient's power within 30 minutes for unpaid bills. Potential UDAP and TCPA violations.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Oct 20 21:27 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3305 (new)

Date/Time: 2020-10-01 18:37 UTC

To: +16309145221 From: +12108661809

Campaign: SSA-Various (GovtImpers)

These calls fraudulently claim to be from US Social Security Administration, threatening problems with SS account. Calling number may be a spoofed toll-free number, or a call-back number. These incidents may be from separate campaigns.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Oct 20 21:28 UTC

USTELECOM

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Call Details for Traceback #3313 (new)

Date/Time: 2020-10-09 22:46 UTC

To: +13172925853 From: +13172560188

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Oct 20 20:50 UTC

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Call Details for Traceback #3329 (new)

Date/Time: 2020-10-16 17:54 UTC

To: +17205766948 From: +17205768527

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Oct 20 14:59 UTC

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3338 (new)

Date/Time: 2020-10-14 21:46 UTC

To: +14343340431 From: +14347286018

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Oct 20 16:40 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3339 (new)

Date/Time: 2020-10-16 19:43 UTC

To: +17323221263 From: +18003582090

Campaign: BofA - Chinese Voice Department

Confirmed fraudulent call, identifying the calling party as Bank of America's Chinese Voice Dept. Recorded voice in foreign language.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Oct 20 19:45 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3336 (new)

Date/Time: 2020-10-16 17:43 UTC

To: +13053455600 From: +15616278328

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 21 Oct 20 19:15 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3375 (new)

Date/Time: 2020-10-21 15:59 UTC

To: +12196702513 From: +14078961571

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 21 Oct 20 22:12 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3378 (new)

Date/Time: 2020-10-21 11:35 UTC

To: +17275885222 From: +12023673346

Campaign: TDoS - Hospital ER Oct 21

Urgent. Active TDoS attack affecting major hospital, disrupting emergency room lines.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Oct 20 19:40 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3388 (new)

Date/Time: 2020-10-22 15:31 UTC

To: +12099689504 From: +15107196474

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Oct 20 19:56 UTC

USTELECOM

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To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3386 (new)

Date/Time: 2020-10-22 16:22 UTC

To: +17042362946

From: +19805805052

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements.

Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Oct 20 16:04 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

Responding to This Request

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3387 (new)

Date/Time: 2020-10-21 15:34 UTC

To: +14154207123 From: +14156645662

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 27 Oct 20 22:28 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3424 (new)

Date/Time: 2020-10-27 18:24 UTC

To: +19166061486 From: +14155675039

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 28 Oct 20 00:29 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3427 (new)

Date/Time: 2020-10-27 17:09 UTC

To: +12162722601 From: +14782366213

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Oct 20 12:52 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3449 (new)

Date/Time: 2020-10-29 16:08 UTC

To: +13092368670 From: +13092368963

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Oct 20 21:16 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3467 (new)

Date/Time: 2020-10-30 07:15 UTC

To: +15592071345 From: +15595542972

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Nov 20 23:55 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3470 (new)

Date/Time: 2020-10-30 18:13 UTC

To: +19704434520From: +13257627039Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 02 Nov 20 15:24 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

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Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3469 (new)

Date/Time: 2020-10-30 16:59 UTC

To: +19015901527 From: +19014227394

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 03 Nov 20 18:50 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3491 (new)

Date/Time: 2020-11-03 14:29 UTC

To: +19174744614 From: +19174746959

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 04 Nov 20 20:48 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3500 (new)

Date/Time: 2020-11-04 14:17 UTC

To: +19192705765 From: +19192704271

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Nov 20 13:08 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3502 (new)

Date/Time: 2020-11-04 21:45 UTC

To: +14043331612 From: +14235248069

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 12:35 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3515 (new)

Date/Time: 2020-11-03 20:23 UTC

To: +16107015671 From: +14232051615

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 12:36 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3516 (new)

Date/Time: 2020-11-03 20:22 UTC

To: +17704573716 From: +14232051615

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 13:27 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3520 (new)

Date/Time: 2020-11-05 17:32 UTC

To: +18454222234 From: +18454522713

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 18:35 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3532 (new)

Date/Time: 2020-11-06 17:28 UTC

To: +14843402875 From: +14078567877

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 19:48 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Call Details for Traceback #3538 (new)

Date/Time: 2020-11-05 17:12 UTC

To: +16189677570 From: +16189676967 Campaign: CCIRR - VisaAlert

FRAUD. Automated voice offering zero percent interest rate, identified as the alert system with Visa MasterCard Account Services. Caller ID is spoofed with a random NPA so blocking the ANI is not effective. Many caller-IDs are invalid. Millions of calls daily. Calls are illegal because they are automated calls to mobiles, they use improper caller-ID, they do not identify the caller at the beginning of the message, they do not give an operable call-back number. This call is just one example of millions of similar calls. Originators please search your records for similar traffic and address with your customer.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 20:58 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3534 (new)

Date/Time: 2020-11-06 17:33 UTC

To: +12016180263 From: +17108854973

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Nov 20 21:09 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Call Details for Traceback #3539 (new)

Date/Time: 2020-11-06 15:48 UTC

To: +12148039575 From: +14696460814

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Nov 20 11:08 UTC

USTELECOM

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3517 (new)

Date/Time: 2020-11-02 23:45 UTC

To: +18282565324 From: +14232051615

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Nov 20 16:08 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3562 (new)

Date/Time: 2020-11-10 14:45 UTC

To: +17733831213 From: +17733834307

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Nov 20 14:22 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3601 (new)

Date/Time: 2020-11-13 14:37 UTC

To: +13472676025 From: +12176525064

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Nov 20 18:18 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3609 (new)

Date/Time: 2020-11-12 17:15 UTC

To: +13146144114 From: +13143607443

Campaign: Utility-30MinDisconnect

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Nov 20 20:34 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3596 (new)

Date/Time: 2020-11-12 19:32 UTC

To: +13369728109 From: +15614851173 Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Nov 20 23:42 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3618 (new)

Date/Time: 2020-11-16 20:56 UTC

To: +18176756520 From: +18176681937

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Nov 20 15:32 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

About the ITG and the Traceback Process

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3637 (new)

Date/Time: 2020-11-18 17:26 UTC

To: +16082091407 From: +18667636020

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Nov 20 18:31 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3648 (new)

Date/Time: 2020-11-19 14:54 UTC

To: +12013068860 From: +15162916551

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Nov 20 18:56 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3638 (new)

Date/Time: 2020-11-18 17:16 UTC

To: +19099382089 From: +18668969240

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Nov 20 16:50 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3666 (new)

Date/Time: 2020-11-23 14:33 UTC

To: +14438441585 From: +14438446982

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Nov 20 18:08 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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(URL is a private login; do not share.)

Call Details for Traceback #3655 (new)

Date/Time: 2020-11-20 15:01 UTC

To: +14436943211 From: +14436945790

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Nov 20 22:35 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Call Details for Traceback #3630 (new)

Date/Time: 2020-11-18 17:30 UTC

To: +13023896918 From: +13023896557

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Nov 20 19:05 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The ITG coordinates with carriers at all levels within the call path seeking to identify the source of and eliminate illegal robocall traffic and eliminate such traffic. The ITG also coordinates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate. For more information about the ITG or a list of the current members, see the ITG website

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3732 (new)

Date/Time: 2020-11-30 15:56 UTC

To: +17737937445 From: +17737935234

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Nov 20 19:07 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3733 (new)

Date/Time: 2020-11-30 14:54 UTC

To: +17735529330 From: +13230291988

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Dec 20 18:19 UTC

USTELECOM

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3743 (new)

Date/Time: 2020-12-01 15:00 UTC

To: +13023592189 From: +13023595927

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Dec 20 18:24 UTC

USTELECOM

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3744 (new)

Date/Time: 2020-12-01 15:48 UTC

To: +14432069348 From: +14432066487

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 02 Dec 20 14:59 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3726 (new)

Date/Time: 2020-11-25 23:55 UTC

To: +18458254286 From: +18458853318

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 02 Dec 20 18:03 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3746 (new)

Date/Time: 2020-12-02 15:22 UTC

To: +16187511462 From: +16187515058

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 03 Dec 20 12:57 UTC

USTELECOM

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My contact information is listed below, and I would be more than happy to discuss this request with you.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3753 (new)

Date/Time: 2020-12-02 16:55 UTC

To: +14802664201 From: +18445779802

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 03 Dec 20 17:07 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3737 (new)

Date/Time: 2020-11-30 18:32 UTC

To: +17707228370From: +16122490528Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 04 Dec 20 20:41 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3778 (new)

Date/Time: 2020-12-04 13:48 UTC

To: +19418076936 From: +12029672853 Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 07 Dec 20 19:50 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3788 (new)

Date/Time: 2020-12-07 14:41 UTC

To: +19495334560 From: +19495173562

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Dec 20 16:40 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3799 (new)

Date/Time: 2020-12-08 14:58 UTC

To: +17347298520 From: +17345598728

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Dec 20 15:42 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3801 (new)

Date/Time: 2020-12-09 14:32 UTC

To: +13023592189 From: +13025088586

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Dec 20 19:07 UTC

USTELECOM

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My contact information is listed below, and I would be more than happy to discuss this request with you.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3803 (new)

Date/Time: 2020-12-09 14:35 UTC

To: +13136159207 From: +13135801847

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Dec 20 22:46 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3802 (new)

Date/Time: 2020-12-09 14:49 UTC

To: +13014015722 From: +13015904251

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Dec 20 02:16 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3798 (new)

Date/Time: 2020-12-08 14:54 UTC

To: +13014716299 From: +13015173009

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Dec 20 17:58 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3808 (new)

Date/Time: 2020-12-09 17:04 UTC

To: +12032571147 From: +12032573662

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Dec 20 18:49 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3816 (new)

Date/Time: 2020-12-10 15:39 UTC

To: +14109780435 From: +14105851716

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Dec 20 21:40 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3818 (new)

Date/Time: 2020-12-10 15:02 UTC

To: +15803706720 From: +15806883261

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Dec 20 15:24 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3813 (new)

Date/Time: 2020-12-09 21:15 UTC

To: +15126325341 From: +15126324456

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Dec 20 15:54 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3804 (new)

Date/Time: 2020-12-09 20:40 UTC

To: +14075924535 From: +16155517603 Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Dec 20 20:40 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3837 (new)

Date/Time: 2020-12-11 16:06 UTC

To: +12253646147 From: +12253125463

Campaign: SSA-P1-TexasFraud (GovtImpers)

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Dec 20 20:41 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3821 (new)

Date/Time: 2020-12-11 14:44 UTC

To: +14433869280 From: +14436118385

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Dec 20 22:20 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #3847 (new)

Date/Time: 2020-12-14 16:40 UTC

To: +13214394256 From: +18775698765

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Dec 20 22:23 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3831 (new)

Date/Time: 2020-12-11 16:41 UTC

To: +12528221732From: +16155517549Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 15 Dec 20 14:36 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3838 (new)

Date/Time: 2020-12-14 14:51 UTC

To: +14147649957 From: +14146305374

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 15 Dec 20 20:04 UTC

USTELECOM

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3856 (new)

Date/Time: 2020-12-15 13:12 UTC

To: +17404858614 From: +17405587922

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 16 Dec 20 18:27 UTC

USTELECOM

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3870 (new)

Date/Time: 2020-12-16 16:05 UTC

To: +12165342312 From: +12165311746

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 18 Dec 20 21:39 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3889 (new)

Date/Time: 2020-12-18 17:00 UTC

To: +13107539888 From: +13103544768

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Dec 20 19:07 UTC

USTELECOM

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> Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #3913 (new)

Date/Time: 2020-12-21 22:46 UTC

To: +19407660640 From: +19858732466

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Dec 20 19:09 UTC

USTELECOM

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(URL is a private login; do not share.)

Call Details for Traceback #3902 (new)

2020-12-22 15:49 UTC Date/Time:

To: +14065702116 From: +14064644770

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume

campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Dec 20 20:56 UTC

USTELECOM

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By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3925 (new)

Date/Time: 2020-12-23 17:02 UTC

To: +17737102238 From: +17735394273

Campaign: TestCall-StaySafeStayHome

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Dec 20 11:53 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3901 (new)

Date/Time: 2020-12-22 14:20 UTC

To: +12487705626 From: +12486358481

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 06 Jan 21 16:28 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #3978 (new)

Date/Time: 2021-01-05 14:40 UTC

To: +12193639044 From: +12194155763

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Jan 21 17:27 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4029 (new)

Date/Time: 2021-01-11 14:09 UTC

To: +18155096406 From: +18154141578

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Jan 21 19:30 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4027 (new)

Date/Time: 2021-01-10 17:12 UTC

To: +15033691774 From: +15033693771

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 12 Jan 21 15:51 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #4041 (new)

Date/Time: 2021-01-12 14:12 UTC

To: +17066277556 From: +17066014816

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 12 Jan 21 16:47 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

About the ITG and the Traceback Process

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

Responding to This Request

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- 2. If, in investigating the traffic, the end user originating the traffic is able to demonstrate to you that the traffic complies with applicable U.S. laws and regulations, in the portal's comments section for the applicable traffic, identity of the end user and provide a description of the traffic and the end user's explanation of why it complies with U.S. laws and regulations.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4043 (new)

Date/Time: 2021-01-12 14:27 UTC

To: +18062245984 From: +18065849489

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Jan 21 22:14 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from reaching U.S. consumers.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4067 (new)

Date/Time: 2021-01-14 15:24 UTC

To: +18583492445 From: +19152003833 Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 26 Jan 21 14:44 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4154 (new)

Date/Time: 2021-01-25 18:29 UTC

To: +16302050658From: +14433967696Campaign: SSA-CalltheSSA

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 26 Jan 21 16:05 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4159 (new)

Date/Time: 2021-01-25 20:50 UTC

To: +12108676248 From: +12106237952

Campaign: TestCall-StaySafeStayHome

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 27 Jan 21 21:41 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal: Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4179 (new)

Date/Time: 2021-01-27 19:43 UTC

To: +13147992826 From: +13147993582

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 28 Jan 21 20:44 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Call Details for Traceback #4179 (new)

Date/Time: 2021-01-27 19:43 UTC

To: +13147992826 From: +13147993582

Campaign: Apple-iCloud-AccountBreached

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 29 Jan 21 23:17 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

About the ITG and the Traceback Process

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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To the extent that our industry effort identifies the originator of these suspicious robocalls, we first ask that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, USTelecom will provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process. Similarly, USTelecom may advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so. Similarly, if this industry effort fails to trace these calls to their origin, USTelecom may inform the appropriate agencies about the suspicious robocalls and the point in the call path where the investigation ends.

Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4204 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-01-29 20:50:00 +0000 UTC

To: +17736165991 From: +17736163598

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 30 Jan 21 16:15 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4202 0 seconds ago

Campaign: TestCall-StaySafeStayHome
Date/Time: 2021-01-29 19:19:00 +0000 UTC

To: +13163052133 From: +13164198914

Artificial voice announces "Hello. This is just a test call. Time to stay home. Stay safe and stay home." Automated calls to wireless numbers not permitted. Caller-ID is spoofed without permission. Caller does not identify source of call or provide opt-out. High-volume campaign.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Feb 21 12:59 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4207 0 seconds ago

Campaign: SSA-CalltheSSA

Date/Time: 2021-01-29 15:56:00 +0000 UTC

To: +17818882822 From: +14693000312

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 04 Feb 21 16:29 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4223 0 seconds ago

Campaign: SSA-CalltheSSA

Date/Time: 2021-02-02 20:52:46 +0000 UTC

To: +14159335083 From: +16617772091

FRAUD. Recorded message says SSN is suspended due to law enforcement action. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Feb 21 19:04 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #4261 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-07 17:30:13 +0000 UTC

To: +18652069105 From: +18652062501

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Feb 21 19:06 UTC

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4263 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-06 16:23:28 +0000 UTC

To: +13609209292 From: +13609201588

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Feb 21 19:09 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4264 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-07 19:50:44 +0000 UTC

To: +18172714858 From: +18172716374

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Feb 21 16:08 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #4347 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-21 17:57:30 +0000 UTC

To: +12109957090 From: +12109958183

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Feb 21 17:08 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4349 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-21 22:20:49 +0000 UTC

To: +12092511832 From: +12092515387

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Feb 21 17:38 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4350 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-02-21 22:14:17 +0000 UTC

To: +12092511832 From: +12092518011

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 04 Mar 21 16:47 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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(URL is a private login; do not share.)

Call Details for Traceback #4429 0 seconds ago

Campaign: Utility-30MinDisconnect

Date/Time: 2021-03-03 18:43:48 +0000 UTC

To: +12159398987 From: +12154335463

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Mar 21 16:11 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4456 0 seconds ago

Campaign: Discount-Avail50%

Date/Time: 2021-03-04 16:13:34 +0000 UTC

To: +17023787701 From: +18882071288

Apparent fraud. Caller offers promotions to receive a discount on the called party's voice/internet service provider bill. Automated calls to wireless numbers generally not permitted. Voice-mail message does not identify the calling entity, nor does it provide an opt-out option.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Mar 21 16:55 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

To assist us in this effort, we are asking that you respond to this traceback inquiry as soon as possible, but no later than three business days from now. Information, including call details, related to this traceback request is available in the secure online portal linked at the end of this email.

By way of introduction, my name is Josh Bercu, and I coordinate the efforts of USTelecom's ITG, the official U.S. Federal Communications Commission (FCC)-designated registered traceback consortium that works to identify the source of illegal robocalls. In accordance with Section 13(d) of the TRACED Act, and Section 0.111(i) of the FCC's regulations, we are writing to request your assistance on a traceback investigation that we reasonably believe involves fraudulent, abusive or potentially unlawful robocalls.

My contact information is listed below, and I would be more than happy to discuss this request with you.

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The FCC's Enforcement Bureau has also concluded that "contractual provisions that prohibit, delay, or otherwise interfere with a voice service provider's cooperation with private-led traceback efforts are contrary to the spirit and goals of the TRACED Act." See <u>DA 20-785</u>, ¶ 28. The Enforcement Bureau therefore "encourage[d] voice service providers to review their contracts and eliminate such contract provisions as soon as possible." *Id.*

Finally, Section 2702(c)(3) of the Electronic Communications Privacy Act (ECPA) permits providers to divulge a record or other information pertaining to a subscriber to or customer of a service, "as may be necessarily incident to . . . the protection of the rights or property of the provider of that service." Given the negative impact of these calls on the rights and property of the members of the ITG, disclosure of information responsive to call tracebacks fits within that exception.

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4452 0 seconds ago

Campaign: CCIRR-P1FinancialImpers

Date/Time: 2021-03-04 20:53:58 +0000 UTC

To: +17862509127 From: +17865830134

Fraud. Financial institution impersonation. Caller purports to be calling from the called party's financial institution and that, based on their payment history, the recipient qualified for an interest rate reduction.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 11 Mar 21 23:16 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

An Industry Traceback Group (ITG) participant recently received traffic from your network that has been deemed suspicious, and we are seeking your assistance in order to identify its origin. Consistent with U.S. federal law and regulations, the ITG requests that you identify the source of this potentially fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request, and do not hesitate to call (202) 551-0761 contact ITG team via reply email should you have any questions

Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4495 0 seconds ago

Campaign: Apple-iCloud-AccountBreached
Date/Time: 2021-03-10 18:34:18 +0000 UTC

To: +14782134312 From: +14782133030

Caller identifies themselves as calling on behalf of Apple and claims the called party's iCloud account has been breached.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 20 Apr 21 17:14 UTC

USTELECOM

THE BROADBAND ASSOCIATION

To Whom It May Concern:

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4811 0 seconds ago

Campaign: Utility-DisconnectDept

Date/Time: 2020-04-07 17:32:00 +0000 UTC

To: +17042301277 From: +12157708893

Prerecorded message claiming to be utility disconnection department and threatening power disconnection within 30 minutes due to a pending balance on the account.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 20 Apr 21 17:15 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4812 0 seconds ago

Campaign: Utility-DisconnectDept

Date/Time: 2021-03-24 19:45:00 +0000 UTC

To: +17043235576 From: +14232051004

Prerecorded message claiming to be utility disconnection department and threatening power disconnection within 30 minutes due to a pending balance on the account.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 26 Apr 21 17:52 UTC

USTELECOM

THE BROADBAND ASSOCIATION

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Submit your response via our secure on-line portal: $\frac{\text{Redacted}}{\text{Red}}$

(URL is a private login; do not share.)

Call Details for Traceback #4868 0 seconds ago

Campaign: SSA-Suspended

Date/Time: 2021-04-23 14:49:22 +0000 UTC

To: +15868501089 From: +15868505084

Calls fraudulently claim to be SSA threatening suspension of SSA account with immediate effect unless call-recipient presses 1 to speak to SSA legal department.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 273 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 May 21 14:44 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

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- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4929 0 seconds ago

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)
Date/Time: 2021-05-12 15:07:12 +0000 UTC

To: +17138228183 From: +17138227818

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 18 May 21 19:11 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4952 0 seconds ago

Campaign: SSA-Suspended

Date/Time: 2021-05-17 16:14:46 +0000 UTC

To: +15754433707 From: +15754432689

Calls fraudulently claim to be SSA threatening suspension of SSA account with immediate effect unless call-recipient presses 1 to speak to SSA legal department.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 24 May 21 05:20 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4972 0 seconds ago

Campaign: SSA-VT

Date/Time: 2021-05-10 17:47:00 +0000 UTC

To: +18027776961 From: +18027775361

Caller fraudulently claims to be from US Social Security Administration threatening problems with SS account. Potential TCPA violation and Vermont Consumer Protection Act violation.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 02 Jun 21 18:43 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #4932 0 seconds ago

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)
Date/Time: 2021-05-13 19:21:09 +0000 UTC

To: +19033411326 From: +19033419889

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 03 Jun 21 16:47 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5100 0 seconds ago

 Campaign:
 SSA-P1-TexasFraud (GovtImpers)

 Date/Time:
 2021-06-02 16:50:41 +0000 UTC

To: +18126862009 From: +18125886550

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 03 Jun 21 16:50 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5096 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-05-10 17:14:20 +0000 UTC

To: +17026777640 From: +17026980784

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 07 Jun 21 18:24 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5129 0 seconds ago

Campaign: SSA-Suspended

Date/Time: 2021-06-04 17:25:49 +0000 UTC

To: +19253219905 From: +19253217087

Calls fraudulently claim to be SSA threatening suspension of SSA account with immediate effect unless call-recipient presses 1 to speak to SSA legal department.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Jun 21 13:05 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5143 0 seconds ago

Campaign: FedReserv-Impers

Date/Time: 2021-06-02 17:34:00 +0000 UTC

To: +14789732938 From: +14789932619

Calls claiming to be from law enforcement Federal Reserve unit where the caller alleges they found suspicious activity from their banking account which there is a legal case being filed under your name and there is an arrest warrant being issued for the same in order to talk to an officer from law enforcement unit of Federal Reserve System please press one and hold the line.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 281 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Jun 21 18:38 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5158 0 seconds ago

Campaign: SSA - RegretToInform

Date/Time: 2021-06-02 15:47:00 +0000 UTC

To: +18147794654 From: +18147792409

Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service. Caller claims to be from Social Security Admin demanding callback prior to suspending SSN, threatening arrest. Message: "Call it from Social Security Administration we would like to notify you that we have got an order to suspend your social immediately within 24 hours due to suspicious and fraudulent activity found on your social we regret to inform you that this case is critical and time-sensitive is required your urgent attention as criminal case can be registered on your name if you do not want to get arrested press one to speak to the officer"

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Jun 21 16:33 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5169 0 seconds ago

Campaign: SSA-P1-BenefitsCanceled (GovtImpers)
Date/Time: 2021-06-08 18:31:00 +0000 UTC

To: +19858706025 From: +19858708308

Captured recordings suggest these calls are perpetrating a SERIOUS FRAUD. Caller is impersonating a federal official. Automated message threatens that social security benefits will be canceled. Caller-ID appears to be a random toll-free number. Called party is asked to press 1 to speak to an agent. Caller-ID is random (different on each call) so blocking the ANI is not effective. This call is just one example representative of millions of similar calls. Originators please search your records for similar traffic.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 23 Jun 21 21:53 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5330 0 seconds ago

Campaign: SSA-CrimeInvestigation

Date/Time: 2021-06-22 18:44:00 +0000 UTC

To: +19707780256 From: +19787613984

Caller is impersonating a federal official. Automated voice claims suspicious activity on your social security number. "Hello this is an urgent notice enforcement agencies to suspend your social security number on an immediate basis and money-laundering case so I want you to reach us immediately your Banking and government services are blocked now due to suspension of your Social Security number to know more about this case File reaches back on same number before we issue an arrest warrant for Crime investigation if we do not hear back from you will be considered as an intentional crime"

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 26 Jul 21 18:48 UTC

INDUSTRY TRACEBACK GROUP

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- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5526 0 seconds ago

Campaign: Amazon - Acct On Hold

Date/Time: 2021-07-15 16:45:00 +0000 UTC

To: +17089275564 From: +17089273851

Automated voice claiming to be Amazon customer service calling about a recent order and due to suspicious activity the account may be placed on hold. Wireless numbers never been in service or currently not in service.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 26 Jul 21 18:51 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5585 0 seconds ago

Campaign: SSA-KindlyPressOne

Date/Time: 2021-07-23 22:23:34 +0000 UTC

To: +12088903944 From: +12088643308

These calls fraudulently claim to be from the SSA and advise a legal enforcement action has been filed on social security number.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Aug 21 23:00 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #5693 0 seconds ago

Campaign: Amazon-SuspiciousCharge

Date/Time: 2021-08-04 00:07:00 +0000 UTC

To: +15705743191 From: +15705747280

Calls to wireless numbers impersonating Amazon, claiming suspicious charges on customer's account. Random auto-dialing. Wireless numbers never been in service or currently not in service.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Sep 21 14:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6048 0 seconds ago

Campaign: Legal Enforcement Notice

Date/Time: 2021-09-13 16:46:15 +0000 UTC

To: +19048816709 From: +19706477298

Pre-recorded calls from spoofed numbers to consumers stating a warrant has been issued against them due to fraudulent activity and to press 1 for more information.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Oct 21 13:52 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6391 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2021-10-07 20:54:33 +0000 UTC

To: +17276446307 From: +17273004930

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 19 Oct 21 17:37 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6525 0 seconds ago

Campaign: SSA-KindlyPressOne

Date/Time: 2021-10-18 21:23:19 +0000 UTC

To: +17025610226 From: +19047855234

These calls fraudulently claim to be from the SSA and advise a legal enforcement action has been filed on social security number.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 21 Oct 21 17:33 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6591 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-10-20 19:29:52 +0000 UTC

To: +18605181089 From: +13173394249

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 21 Oct 21 18:59 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6593 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-10-20 18:17:52 +0000 UTC

To: +18303253492 From: +13175941323

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Oct 21 13:41 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6598 0 seconds ago

Campaign: Utility-30MinDisconnect

Date/Time: 2021-10-21 18:23:49 +0000 UTC

To: +19165216493 From: +19165214366

Likely FRAUD. Recorded message says your electric service will be disconnected in 30 minutes; press 1 to make payment arrangements. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 29 Oct 21 20:44 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6738 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-10-27 15:56:52 +0000 UTC

To: +16625822679 From: +16625843805

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Nov 21 13:33 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6737 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-10-27 16:07:18 +0000 UTC

To: +15025231025 From: +15025299770

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 01 Nov 21 14:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6736 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-10-27 18:25:09 +0000 UTC

To: +15025231025 From: +15025256377

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Nov 21 15:23 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6833 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-11-03 16:40:00 +0000 UTC

To: +18162107256 From: +18162156809

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 05 Nov 21 15:31 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6824 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2021-11-03 15:15:03 +0000 UTC

To: +13107467544 From: +13107494372

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Nov 21 20:15 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6882 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2021-11-05 01:29:00 +0000 UTC

To: +18306370945 From: +18062276904

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Nov 21 20:33 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6885 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2021-11-03 19:58:00 +0000 UTC

To: +14347701779 From: +17572013137

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Nov 21 21:55 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6886 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2021-11-03 19:35:00 +0000 UTC

To: +14252476290 From: +14254307302

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 09 Nov 21 18:52 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #6884 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2021-11-04 00:44:00 +0000 UTC

To: +15012701303 From: +18706805335

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 22 Nov 21 19:02 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #7044 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2021-11-16 16:33:07 +0000 UTC

To: +18023538170 From: +18016797189

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Dec 21 14:25 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #7249 0 seconds ago

Campaign: SSA-KindlyPressOne

Date/Time: 2021-12-07 16:26:43 +0000 UTC

To: +15129929046 From: +15129922595

These calls fraudulently claim to be from the SSA and advise a legal enforcement action has been filed on social security number.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 08 Dec 21 15:02 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #7250 0 seconds ago

Campaign: SSA-KindlyPressOne

Date/Time: 2021-12-06 13:46:31 +0000 UTC

To: +15129929046 From: +15129921339

These calls fraudulently claim to be from the SSA and advise a legal enforcement action has been filed on social security number.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 13 Jan 22 17:40 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #7633 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-01-12 21:52:49 +0000 UTC

To: +12256509409 From: +12256503614

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 14 Jan 22 23:49 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #7655 0 seconds ago

Campaign: SSA-KindlyPressOne-2

Date/Time: 2022-01-10 16:20:00 +0000 UTC

To: +17178440299 From: +18709003693

These calls fraudulently claim to be from the SSA and advise a legal enforcement action has been filed on social security number.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Feb 22 20:58 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8047 0 seconds ago

Campaign: Amazon-SuspiciousCharge
Date/Time: 2022-02-08 22:56:32 +0000 UTC

To: +18642001971 From: +18642009362

Calls to wireless numbers impersonating Amazon, claiming suspicious charges on customer's account. Random auto-dialing. Wireless numbers never been in service or currently not in service.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com

Date: 10 Feb 22 21:00 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8048 0 seconds ago

Campaign: Amazon-SuspiciousCharge
Date/Time: 2022-02-08 19:04:06 +0000 UTC

To: +13045905202 From: +13045904780

Calls to wireless numbers impersonating Amazon, claiming suspicious charges on customer's account. Random auto-dialing. Wireless numbers never been in service or currently not in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 309 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 10 Feb 22 22:31 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Responding to This Request

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8050 0 seconds ago

Campaign: Amazon-SuspiciousCharge

Date/Time: 2022-02-08 18:20:12 +0000 UTC

To: +12012505192 From: +12012508878

Calls to wireless numbers impersonating Amazon, claiming suspicious charges on customer's account. Random auto-dialing. Wireless numbers never been in service or currently not in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 310 of 444

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Mar 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

noc, you can find your organization's **Monthly Metrics** below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	1 hour 9 minutes	1

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Opextel, LLC	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6ImthdGhlcmluZS5yb3NhbGVzQHNtYXJ0Yml6dGVsLmNvbSIsImlkIjoxMDAzMCwianRpIjoiMTAwMzAifQ.mgP_5jeEKGCuVOKrFTc0xCGi80wMxdTcV14mBQnyu

To: eborrero@smartbiztel.com
Date: 01 Mar 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's **Monthly Metrics** below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	1 hour 9 minutes	1

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Opextel, LLC	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6ImVib3JyZXJvQHN tYXJ0Yml6dGVsLmNvbSIsImlkIjoxMTIwMSwianRpIjoiMTEyMDEifQ.mLlJeQG-KjgTTQjSIFBnwiLKZjvZ2heqjiR9VQJGQEk

To: noc@smartbiztel.com

Date: 01 Mar 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

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Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	1 hour 9 minutes	1

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Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Opextel, LLC	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6Im5vY0BzbWFydG JpenRlbC5jb20iLCJpZCI6NjQ4LCJqdGkiOiI2NDgifQ.ncWchlTO9C2yPyehwcznh_cX9BRzWVdalD83bJzqYBE

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 07 Mar 22 21:49 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8319 0 seconds ago

Campaign: Travel Scam-Costco

Date/Time: 2022-03-04 23:47:32 +0000 UTC

To: +19282714872 From: +16027240592

Recorded voice offering hospitality incentive through high-volume calling campaign, including to wireless numbers. Use of brand names, including Costco, apparently fraudulently without permission. Caller also falsely claims association with Hilton and Marriott. Suspected caller-ID spoofing due to high volume of originating numbers. Failure to identify the entity responsible for the call.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 314 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 08 Mar 22 02:34 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8311 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2022-03-06 16:11:10 +0000 UTC

To: +16054001440 From: +16059898493

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 315 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 09 Mar 22 15:57 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8343 0 seconds ago

Campaign: Utility-ElectricRebateCheck-P1
Date/Time: 2022-03-08 18:33:18 +0000 UTC

To: +16143273052 From: +16143543412

Recorded message says you will receive a rebate check for utility service due to an overcharge by a third party supplier. Assorted toll-free or other numbers used as caller-ID.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 09 Mar 22 17:20 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8338 0 seconds ago

Campaign: Utility-ElectricRebateCheck-P1
Date/Time: 2022-03-08 16:01:25 +0000 UTC

To: +12162581980 From: +12162058776

Recorded message says you will receive a rebate check for utility service due to an overcharge by a third party supplier. Assorted toll-free or other numbers used as caller-ID.

To: eborrero@smartbiztel.com
Date: 01 Apr 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's **Monthly Metrics** below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	3 hours 20 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6ImVib3JyZXJvQHN tYXJ0Yml6dGVsLmNvbSIsImlkIjoxMTIwMSwianRpIjoiMTEyMDEifQ.mLlJeQG-KjgTTQjSIFBnwiLKZjvZ2heqjiR9VQJGQEk

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 318 of 444

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Apr 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

noc, you can find your organization's **Monthly Metrics** below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	3 hours 20 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6ImthdGhlcmluZS5yb3NhbGVzQHNtYXJ0Yml6dGVsLmNvbSIsImlkIjoxMDAzMCwianRpIjoiMTAwMzAifQ.mgP_5jeEKGCuVOKrFTc0xCGi80wMxdTcV14mBQnyurg

To: noc@smartbiztel.com
Date: 01 Apr 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

NOC, you can find your organization's **Monthly Metrics** below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
3	0	0	0	0	0	0	3 hours 20 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6Im5vY0BzbWFydG JpenRlbC5jb20iLCJpZCI6NjQ4LCJqdGkiOiI2NDgifQ.ncWchlTO9C2yPyehwcznh_cX9BRzWVdalD83bJzqYBE

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 320 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Apr 22 17:26 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

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- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8606 0 seconds ago

Campaign: Amazon-AuthorizeOrder-P3
Date/Time: 2022-03-30 21:26:27 +0000 UTC

To: +18649347810 From: +12073648869

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 321 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Apr 22 14:20 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8718 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-04-08 01:20:28 +0000 UTC

To: +15756187233 From: +15758883317

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 322 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Apr 22 15:45 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8719 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-04-11 22:04:26 +0000 UTC

To: +19712842814 From: +19715125516

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 323 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Apr 22 15:46 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8715 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-04-09 00:39:50 +0000 UTC

To: +15302405109 From: +15308172249

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 324 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Apr 22 15:47 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8721 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-04-11 19:00:32 +0000 UTC

To: +16052229305 From: +16059494317

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 325 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Apr 22 18:28 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8736 0 seconds ago

Campaign: Apple-SuspiciousActivity

Date/Time: 2022-04-01 16:35:00 +0000 UTC

To: +12062327528 From: +12062322521

Caller claiming to be from Apple Security regarding suspicious activity on a cloud account.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 326 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Apr 22 14:54 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8737 0 seconds ago

Campaign: StudentLoan-Forgiveness

Date/Time: 2022-04-05 20:24:00 +0000 UTC

To: +13194313880 From: +15416558857

Calls to recipients offering student loan forgiveness. Recipients may not have student loans.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 327 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Apr 22 14:56 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8739 0 seconds ago

Campaign: ImproperTN-Use

Date/Time: 2022-03-30 16:01:00 +0000 UTC

To: +17023375905 From: +12012000012

Improper use of number on authenticated call as part of bulk calling campaign.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 328 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Apr 22 14:58 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8741 0 seconds ago

Campaign: ImproperTN-Use

Date/Time: 2022-03-30 16:08:00 +0000 UTC

To: +17025262784 From: +12012000012

Improper use of number on authenticated call as part of bulk calling campaign.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 329 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Apr 22 15:00 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8742 0 seconds ago

Campaign: ImproperTN-Use

Date/Time: 2022-03-30 16:02:00 +0000 UTC

To: +17752300611 From: +12012000012

Improper use of number on authenticated call as part of bulk calling campaign.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 330 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Apr 22 21:01 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #8840 0 seconds ago

Campaign: Travel-Brand-Impers

Date/Time: 2022-04-21 18:51:43 +0000 UTC

To: +17039990645 From: +17032132856

Recorded voice offering hospitality incentive through high-volume calling campaign, including to wireless numbers. Confirmed fraudulent use of third-party brand names, including Marriott, without permission of the brand owner. Caller also falsely claims association with Hilton and Four Seasons. Suspected caller-ID spoofing due to high volume of originating numbers. Failure to identify the entity responsible for the call.

To: noc@smartbiztel.com
Date: 01 May 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

NOC, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
8	0	0	0	0	0	0	49 minutes 13 seconds	3

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	4	0	4	0	0	0
Etelix.com USA, LLC	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6Im5vY0BzbWFydG JpenRlbC5jb20iLCJpZCI6NjQ4LCJqdGkiOiI2NDgifQ.ncWchlTO9C2yPyehwcznh_cX9BRzWVdalD83bJzqYBE

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From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 May 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

noc, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
8	0	0	0	0	0	0	49 minutes 13 seconds	3

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	4	0	4	0	0	0
Etelix.com USA, LLC	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

To: eborrero@smartbiztel.com
Date: 01 May 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
8	0	0	0	0	0	0	49 minutes 13 seconds	3

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	4	0	4	0	0	0
Etelix.com USA, LLC	1	0	1	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?

location=/providers/provider/summaries/386&token=eyJhbGciOiJIUzI1NiIsInR5cCI6IkpXVCJ9.eyJ1c2VybmFtZSI6ImVib3JyZXJvQHN tYXJ0Yml6dGVsLmNvbSIsImlkIjoxMTIwMSwianRpIjoiMTEyMDEifQ.mLlJeQG-KjgTTQjSIFBnwiLKZjvZ2heqjiR9VQJGQEk

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 02 May 22 20:56 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: **Redacted** (URL is a private login; do not share.)

Call Details for Traceback #8885 0 seconds ago

Campaign: AutoWarranty-Expiring

Date/Time: 2022-04-26 18:12:00 +0000 UTC

To: +14086302511 From: +14086304545

Significant amount of spoofed calls per day using a prerecorded message suggesting car warranty is expiring. Likely no consent to make

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 335 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 May 22 18:42 UTC

INDUSTRY TRACEBACK GROUP

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As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9127 0 seconds ago

Campaign: StudentLoan-ForgivenessCenter
Date/Time: 2022-05-17 20:30:22 +0000 UTC

To: +12069725785 From: +18307234696

Call to mobile using pre-recorded voice. Referencing student loan Forgiveness center; Some call recipients do not have student loans.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 26 May 22 00:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9194 0 seconds ago

Campaign: Bank-Impers-P2

Date/Time: 2022-05-19 01:35:00 +0000 UTC

To: +15088132683 From: +18004321000

Bank of America Impersonation. Client receives a call from a spoofed number claiming to be a Bank of America representative. The caller attempts to social engineer victim into providing sensitive information and executing transactions.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 337 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 26 May 22 15:29 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9197 0 seconds ago

Campaign: Bank-Impers-P2

Date/Time: 2022-05-16 23:40:00 +0000 UTC

To: +14095494262 From: +18004321000

Bank of America Impersonation. Client receives a call from a spoofed number claiming to be a Bank of America representative. The caller attempts to social engineer victim into providing sensitive information and executing transactions.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 338 of 444

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Jun 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

noc, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
2	0	0	0	0	0	0	3 hours 38 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	4	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=10030&token=fd59d524-dea4-4787-a4d7-f10bba1d50a7

To: noc@smartbiztel.com
Date: 01 Jun 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

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2	0	0	0	0	0	0	3 hours 38 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	4	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=648&token=7097d9c6-08cd-4309-9f6d-8256b74987a6

To: eborrero@smartbiztel.com
Date: 01 Jun 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
2	0	0	0	0	0	0	3 hours 38 minutes	2

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	4	0	0	0	0	0

If you have any trouble seeing this email, please visit:
https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=11201&token=d8d15751-214048e9-9eff-8ac43509989c

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 02 Jun 22 20:11 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9227 0 seconds ago

Campaign: SpamCalls-Spoofed-P1

Date/Time: 2022-05-26 17:08:00 +0000 UTC

To: +17245967319 From: +17246230023

Spoofed calls impersonating local businesses and government officials causing disruption.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 12:57 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9275 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-08 17:51:09 +0000 UTC

To: +17203152669 From: +13033370870

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 13:01 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9272 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-07 20:21:17 +0000 UTC

To: +14437210768 From: +14104516636

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 344 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 14:17 UTC

INDUSTRY TRACEBACK GROUP

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9274 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-09 17:21:42 +0000 UTC

To: +18136017272 From: +15616263969

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 345 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 14:23 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9270 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-07 18:44:58 +0000 UTC

To: +12488975560 From: +17342940006

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 346 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 14:33 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9269 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-07 00:03:06 +0000 UTC

To: +19139611066 From: +17852101752

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 347 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 13 Jun 22 14:53 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9271 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-06-07 19:08:21 +0000 UTC

To: +16026478509 From: +16232435699

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 348 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Jun 22 21:37 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9427 0 seconds ago

Campaign: AutoWarranty-NationalDealerSvcs-P1
Date/Time: 2022-06-21 20:45:25 +0000 UTC

To: +18147066874 From: +16504902748

Automated, recorded voice calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service. Toll-free callback number not provided in voicemail.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 349 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 23 Jun 22 13:14 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9430 0 seconds ago

Campaign: Spanish-AutoWarranty-Upgrade
Date/Time: 2022-06-20 17:41:18 +0000 UTC

To: +16517926396 From: +15309824711

Pre-recoded calls with Spanish message regarding your vehicle service contract, last attempt to upgrade. Recorded voice calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 350 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 24 Jun 22 13:52 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9465 0 seconds ago

Campaign: SSA-P1-TexasFraud (GovtImpers)
Date/Time: 2022-06-23 23:05:23 +0000 UTC

To: +13524241478 From: +13524247948

FRAUD. Recorded message says SSN is suspended due to fraud in Texas or other state. Caller fraudulently claims to be from SSA. Spoofed caller-ID using random wireless and other USA subscriber numbers.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 29 Jun 22 15:12 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9511 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-06-23 18:11:05 +0000 UTC

To: +14056282527 From: +14056285995

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 352 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 29 Jun 22 17:45 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9543 0 seconds ago

Campaign: Spanish-HealthInsCenter

Date/Time: 2022-06-22 22:24:38 +0000 UTC

To: +13867854535 From: +14075896477

Pre-recorded calls from the Health Insurance Center, to speak to agent press one. Automated calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 353 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 29 Jun 22 18:49 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9541 0 seconds ago

Campaign: Spanish-HealthInsCenter

Date/Time: 2022-06-21 22:24:04 +0000 UTC

To: +14322323954 From: +14327297905

Pre-recorded calls from the Health Insurance Center, to speak to agent press one. Automated calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 354 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Jun 22 16:12 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9551 0 seconds ago

Campaign: AutoWarranty-ExtendOrReinst
Date/Time: 2022-06-29 16:16:57 +0000 UTC

To: +18188075006 From: +18188062990

Recorded voice indicates offers to extend or reinstate vehicle warranty. Recorded message to mobile number. Some calls placed to numbers on national do-not-call list. Calls placed using many different Caller-ID values. Some identify the caller generically as Automotive Services; some voice-mail messages do not capture name of calling entity. Same calling numbers are regularly reported to FTC at donotcall.gov (over 100). We have previously been told caller has consent. Because this campaign routinely appears at the top of our daily tally of highest-volume robocallers, we periodically trace back examples to verify the source. Originator is asked to provide consent details for this call and to address failure to identify calling entity.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Jun 22 16:21 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9553 0 seconds ago

Campaign: AutoWarranty-ExtendOrReinst
Date/Time: 2022-06-29 16:05:31 +0000 UTC

To: +18583545771 From: +18589252536

Recorded voice indicates offers to extend or reinstate vehicle warranty. Recorded message to mobile number. Some calls placed to numbers on national do-not-call list. Calls placed using many different Caller-ID values. Some identify the caller generically as Automotive Services; some voice-mail messages do not capture name of calling entity. Same calling numbers are regularly reported to FTC at donotcall.gov (over 100). We have previously been told caller has consent. Because this campaign routinely appears at the top of our daily tally of highest-volume robocallers, we periodically trace back examples to verify the source. Originator is asked to provide consent details for this call and to address failure to identify calling entity.

To: noc@smartbiztel.com
Date: 01 Jul 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

NOC, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
14	0	0	0	0	0	0	46 minutes 13 seconds	7

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	2	1	1	0	0	0
Etelix.com USA, LLC	8	0	8	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	5	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=648&token=fb0ac696-fc95-49e8-8615-0c467c6e735f

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From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Jul 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

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Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
14	0	0	0	0	0	0	46 minutes 13 seconds	7

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	2	1	1	0	0	0
Etelix.com USA, LLC	8	0	8	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	5	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=10030&token=1d1334d7-c3bd-486a-8820-1b435937498f

To: eborrero@smartbiztel.com
Date: 01 Jul 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
14	0	0	0	0	0	0	46 minutes 13 seconds	7

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	2	1	1	0	0	0
Etelix.com USA, LLC	8	0	8	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	5	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=11201&token=4edf3f65-0c91-4235-b656-630c346c1097

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Jul 22 14:56 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9588 0 seconds ago

Campaign: Discount-DirecTV50

Date/Time: 2022-06-30 18:25:05 +0000 UTC

To: +12533321444 From: +13614629177

FRAUD. Caller claims to be from ATT DirecTV offering 50 percent discount and may request callback. Calls are NOT from DirectTV; caller will attempt to extort money via prepayment. Recorded message to mobile number not allowed.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 360 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Jul 22 15:03 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9579 0 seconds ago

Campaign: Discount-DirecTV50

Date/Time: 2022-06-30 18:29:55 +0000 UTC

To: +14402137689 From: +16184774662

FRAUD. Caller claims to be from ATT DirecTV offering 50 percent discount and may request callback. Calls are NOT from DirectTV; caller will attempt to extort money via prepayment. Recorded message to mobile number not allowed.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Jul 22 06:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9708 0 seconds ago

Campaign: GovtImpers

Date/Time: 2022-07-08 14:38:00 +0000 UTC

To: +18568319478 From: +18775277867

Calls impersonating law enforcement or government officials. Making false statements to possibly extract payment or personal

information.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 14:44 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Responding to This Request

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9727 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-07-12 23:24:03 +0000 UTC

To: +19518099928 From: +15626956435

Hotel impersonation offering a complimentary stay. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 14:59 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9721 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-07-14 17:05:04 +0000 UTC

To: +13362540939 From: +13366903666

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 364 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 14:59 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9722 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-07-14 16:41:43 +0000 UTC

To: +19032446829 From: +19036126146

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 365 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 15:00 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9726 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-07-12 01:13:15 +0000 UTC

To: +14234026248 From: +16153606853

Hotel impersonation offering a complimentary stay. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 366 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 15:12 UTC

INDUSTRY TRACEBACK GROUP

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9728 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-07-13 00:39:46 +0000 UTC

To: +16604923927 From: +13142822499

Hotel impersonation offering a complimentary stay. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 15:33 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9720 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-07-14 18:16:39 +0000 UTC

To: +14693659631 From: +14697379452

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 368 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 15:34 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9719 0 seconds ago

Campaign: LegalDept-Action-P1

Date/Time: 2022-07-14 18:19:20 +0000 UTC

To: +15019440512 From: +15019087422

Calls claiming to be from the Legal Department, advising about the recipient's case and how legal action will be taken against them. To speak to a federal agent they need to press one.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 369 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Jul 22 16:45 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9724 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-07-11 21:00:07 +0000 UTC

To: +15745272339 From: +12605571382

Hotel impersonation offering a complimentary stay. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 370 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 18 Jul 22 12:03 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9725 0 seconds ago

Campaign: Hotel-ComplimentaryStay

Date/Time: 2022-07-11 19:47:37 +0000 UTC

To: +14354145837 From: +18019229383

Hotel impersonation offering a complimentary stay. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 371 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Jul 22 14:25 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9822 0 seconds ago

Campaign: CCIRR-Expire

Date/Time: 2022-07-21 20:10:11 +0000 UTC

To: +17606083091 From: +17609913564

Spoofed calls claiming to be financial institution advising your eligibility for rate reduction is about to expire.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 372 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Jul 22 22:11 UTC

INDUSTRY TRACEBACK GROUP

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Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9820 0 seconds ago

Campaign: CCIRR-Expire

Date/Time: 2022-07-20 22:52:51 +0000 UTC

To: +16177924618 From: +18012806451

Spoofed calls claiming to be financial institution advising your eligibility for rate reduction is about to expire.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 373 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Jul 22 22:12 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9823 0 seconds ago

Campaign: CCIRR-Expire

Date/Time: 2022-07-21 16:29:10 +0000 UTC

To: +18132947767 From: +18635713684

Spoofed calls claiming to be financial institution advising your eligibility for rate reduction is about to expire.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 374 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 27 Jul 22 21:42 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9877 0 seconds ago

Campaign: Financial-Hardship-P3

Date/Time: 2022-07-26 16:11:00 +0000 UTC

To: +16189363175 From: +17156490874

Pre-recorded call offering assistance program to eliminate financial hardship. Evidence suggesting lack of consent, including consumer complaints, honeypot data, and other information.

To: eborrero@smartbiztel.com
Date: 01 Aug 22 09:31 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
13	0	0	0	0	0	2	10 hours 16 minutes	4

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	5	0	5	0	0	0
Red Telecom LLC	1	0	0	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=11201&token=0a521a33-ef26-4871-9a06-b4792c36c58c

To: noc@smartbiztel.com

Date: 01 Aug 22 09:31 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

NOC, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
13	0	0	0	0	0	2	10 hours 16 minutes	4

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	5	0	5	0	0	0
Red Telecom LLC	1	0	0	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=648&token=708a54ab-bbd2-4849-9a2f-1e1efb2dfb42

From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Aug 22 09:31 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

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Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
13	0	0	0	0	0	2	10 hours 16 minutes	4

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Lata 1 Communications Inc.	5	0	5	0	0	0
Red Telecom LLC	1	0	0	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	6	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=10030&token=b71f72da-27d2-4cde-9b9b-b4332103c531

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 02 Aug 22 17:27 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9934 0 seconds ago

Campaign: Discount-DirecTV50

Date/Time: 2022-08-01 19:25:21 +0000 UTC

To: +14792632690 From: +19014130935

FRAUD. Caller claims to be from ATT DirecTV offering 50 percent discount and may request callback. Calls are NOT from DirectTV; caller will attempt to extort money via prepayment. Recorded message to mobile number not allowed.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 05 Aug 22 15:02 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Responding to This Request

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9994 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 21:34:08 +0000 UTC

To: +16058585125 From: +17158005069

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 380 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 05 Aug 22 15:09 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9995 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 21:08:11 +0000 UTC

To: +14234134359 From: +14632446043

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 381 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 05 Aug 22 15:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9993 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 21:58:06 +0000 UTC

To: +12058600784 From: +15632878638

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 05 Aug 22 15:48 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9991 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 22:40:14 +0000 UTC

To: +18649347599 From: +12173501814

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 383 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 05 Aug 22 15:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9990 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 22:56:48 +0000 UTC

To: +14236934775 From: +12098447654

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 384 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 08 Aug 22 18:42 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #9992 0 seconds ago

Campaign: DebtRelief-ZeroTax

Date/Time: 2022-08-03 22:27:14 +0000 UTC

To: +14234134359 From: +19209811319

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 385 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 11 Aug 22 16:48 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10058 0 seconds ago

Campaign: AutoWarranty-Various-P3

Date/Time: 2022-08-08 15:14:00 +0000 UTC

To: +15099445289 From: +13606566593

Caller offering some type of car warranty. Typically using a prerecorded or artificial voice. Some calls are to mobiles. May not honor DNC.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Aug 22 13:41 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10087 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-10 15:32:57 +0000 UTC

To: +15059167890 From: +17372640665

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 387 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Aug 22 13:43 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10088 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-10 22:45:08 +0000 UTC

To: +18609415444 From: +12345624415

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Aug 22 15:38 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10089 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-11 22:23:15 +0000 UTC

To: +14797215403 From: +18317132087

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 389 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Aug 22 16:43 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Responding to This Request

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- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10086 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-11 19:04:15 +0000 UTC

To: +15415914470 From: +13463727634

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 15 Aug 22 19:07 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10085 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-11 18:40:36 +0000 UTC

To: +15418529035 From: +19519012074

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 14:13 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10162 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-15 19:35:40 +0000 UTC

To: +16627030343 From: +17177084591

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 15:07 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10163 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-17 15:31:56 +0000 UTC

To: +16626643872 From: +13866660541

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 393 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 15:09 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10165 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-17 22:04:35 +0000 UTC

To: +14844085907 From: +17072044228

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 15:11 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10159 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-16 19:51:58 +0000 UTC

To: +14752433534 From: +17793231211

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 395 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 17:46 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10167 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-17 16:02:31 +0000 UTC

To: +13136709416 From: +15206500763

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 396 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 17:50 UTC

INDUSTRY TRACEBACK GROUP

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10160 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-16 17:16:05 +0000 UTC

To: +18283370569 From: +18509550193

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 397 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 19 Aug 22 17:56 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10161 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-16 21:10:48 +0000 UTC

To: +12529083863 From: +16099938744

Prerecorded calls claiming recipient inquired for assistance on their IRS tax debt. Caller doesn't identify who they are. Automated calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 398 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 20 Aug 22 12:26 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10166 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-17 15:43:05 +0000 UTC

To: +12315193509 From: +13855660650

Prerecorded calls claiming recipient inquired for assistance on their IRS tax debt. Caller doesn't identify who they are. Automated calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 399 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 20 Aug 22 12:28 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10164 0 seconds ago

Campaign: Tax-Debt-P1

Date/Time: 2022-08-17 20:57:44 +0000 UTC

To: +18147794654 From: +12097642412

Prerecorded calls claiming recipient inquired for assistance on their IRS tax debt. Caller doesn't identify who they are. Automated calls to wireless numbers not permitted without consent. Numbers no longer in service or never been in service.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 400 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 24 Aug 22 16:19 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10224 0 seconds ago

Campaign: StudentLoan-Payments

Date/Time: 2022-08-23 18:56:00 +0000 UTC

To: +14437133457 From: +15302170777

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 401 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 25 Aug 22 14:06 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10237 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-24 19:02:24 +0000 UTC

To: +18607984114 From: +15415815549

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 402 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 25 Aug 22 16:13 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10231 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-24 17:38:36 +0000 UTC

To: +15054002808 From: +19728450350

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 403 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 25 Aug 22 16:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10236 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-24 16:30:02 +0000 UTC

To: +16038920087 From: +16412892883

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 404 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 26 Aug 22 19:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10239 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-24 15:34:47 +0000 UTC

To: +16014702824 From: +16264065470

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 405 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Aug 22 15:12 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10293 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 19:26:07 +0000 UTC

To: +13174522049 From: +14352964843

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 406 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Aug 22 15:14 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10292 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 19:31:51 +0000 UTC

To: +13107351566 From: +19143871062

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 407 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Aug 22 15:17 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10294 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 18:41:44 +0000 UTC

To: +18504961809 From: +16828990913

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 408 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Aug 22 16:20 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10297 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 17:44:30 +0000 UTC

To: +18315780357 From: +16612491810

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 409 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Aug 22 20:31 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10298 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 15:23:46 +0000 UTC

To: +13479613682 From: +17075171309

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 410 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 31 Aug 22 14:03 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10299 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-08-29 15:15:40 +0000 UTC

To: +13479423130 From: +15303317802

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com

Date: 01 Sep 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

NOC, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
32	0	0	0	0	0	1	1 hour 4 minutes	5

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	32	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=648&token=b6a0ed80-b980-492c-83f3-864a1fe8cfbd

From: traceback-notice@tracebacks.org

To: eborrero@smartbiztel.com
Date: 01 Sep 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

Eduardo Borrero, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
32	0	0	0	0	0	1	1 hour 4 minutes	5

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	32	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=11201&token=6341df64-ab79-4674-b01d-f52d722259f3

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From: traceback-notice@tracebacks.org
To: katherine.rosales@smartbiztel.com

Date: 01 Sep 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

noc, you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
32	0	0	0	0	0	1	1 hour 4 minutes	5

Upstream Summary:

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	32	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/email-redirect?location=/providers/provider/summaries/386&userId=10030&token=bca8ad43-7493-4837-925d-985162da124c

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Sep 22 16:32 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10352 0 seconds ago

Campaign: StudentLoan-ForgivenessCenter
Date/Time: 2022-08-31 18:09:53 +0000 UTC

To: +12037459184 From: +17328271944

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Sep 22 16:38 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10349 0 seconds ago

Campaign: StudentLoan-ForgivenessCenter
Date/Time: 2022-08-26 17:22:27 +0000 UTC

To: +16039309928 From: +17753075151

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Sep 22 16:44 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10357 0 seconds ago

Campaign: StudentLoan-ForgivenessCenter
Date/Time: 2022-08-29 16:39:04 +0000 UTC

To: +17342181848 From: +17324120791

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Sep 22 16:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10358 0 seconds ago

Campaign: StudentLoan-ForgivenessCenter
Date/Time: 2022-08-30 16:28:13 +0000 UTC

To: +12486335519 From: +16056004814

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 418 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Sep 22 17:24 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal:

Redacted

(URL is a private login; do not share.)

Call Details for Traceback #10480 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2022-09-12 17:45:09 +0000 UTC

To: +15867093862 From: +15864056881

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 419 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 21 Sep 22 15:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/57360 (URL is a private login; do not share.)

Call Details for Traceback #10579 0 seconds ago

Campaign: CaresAct-PandemicRefund

Date/Time: 2022-09-14 18:50:00 +0000 UTC

To: +12124168455 From: +15418375559

Calls to recipient advising their business is eligible under the CARES Act to receive compensation for employees retained during the pandemic. Recipient doesn't own a business.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 420 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 21 Sep 22 18:55 UTC

INDUSTRY TRACEBACK GROUP

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/57386 (URL is a private login; do not share.)

Call Details for Traceback #10580 0 seconds ago

Campaign: CaresAct-PandemicRefund

Date/Time: 2022-09-21 15:00:00 +0000 UTC

To: +12124168455 From: +13465156123

Calls to recipient advising their business is eligible under the CARES Act to receive compensation for employees retained during the pandemic. Recipient doesn't own a business.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 421 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 22 Sep 22 14:15 UTC

INDUSTRY TRACEBACK GROUP

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/57437 (URL is a private login; do not share.)

Call Details for Traceback #10592 0 seconds ago

Campaign: AutoWarranty-Various-P2

Date/Time: 2022-09-19 15:19:19 +0000 UTC

To: +17329911318 From: +17322097942

Caller offering some type of car warranty. Using a prerecorded or artificial voice. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 30 Sep 22 19:41 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58061 (URL is a private login; do not share.)

Call Details for Traceback #10711 0 seconds ago

Campaign: AutoWarranty-Various-P2

Date/Time: 2022-09-26 15:15:37 +0000 UTC

To: +12316909525 From: +12312618921

Caller offering some type of car warranty. Using a prerecorded or artificial voice. Calls to wireless numbers. Random auto-dialing. Wireless numbers never been in service or currently not in service.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Oct 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

[Redacted], you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
7	0	0	0	0	0	0	56 minutes 23 seconds	3

Upstream Summary:

This table shows the providers who you have identified as an upstream provider in response to tracebacks. The chart displays the number of occurrences in which each of those providers is the Point of Entry, Origin, non-responsive, or was unable to find the call. The information presented only includes the tracebacks where you identified the listed providers; the providers may also have appeared in these positions for other tracebacks as well.

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Red Telecom LLC	2	0	0	0	0	0
Telconus / Telcon US / Telcon Voice / Whisl	7	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/providers/provider/summaries/386

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 04 Oct 22 15:41 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58185 (URL is a private login; do not share.)

Call Details for Traceback #10737 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2022-10-03 19:39:02 +0000 UTC

To: +15868714404 From: +16075352916

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 425 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 07 Oct 22 15:36 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58406 (URL is a private login; do not share.)

Call Details for Traceback #10767 0 seconds ago

Campaign: Discount-Avail50%

Date/Time: 2022-10-06 15:30:43 +0000 UTC

To: +18025355702 From: +17188775059

Calls claiming to be an Internet/TV provider offering 50% discount to recipient. Automated calls to wireless numbers generally not permitted.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 426 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 12 Oct 22 17:18 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58681 (URL is a private login; do not share.)

Call Details for Traceback #10810 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-10-11 15:42:35 +0000 UTC

To: +19292588900 From: +12205003129

Calls to recipients about student loan payment dismissal and/or suspension. Voice-mail message does not identify the calling entity. Evidence suggesting lack of consent, including consumer complaints, honeypot data, and other information.

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 12 Oct 22 17:20 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58683 (URL is a private login; do not share.)

Call Details for Traceback #10811 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-10-11 16:25:09 +0000 UTC

To: +19173402555 From: +15303882927

Calls to recipients about student loan payment dismissal and/or suspension. Voice-mail message does not identify the calling entity. Evidence suggesting lack of consent, including consumer complaints, honeypot data, and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 428 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 12 Oct 22 18:16 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58702 (URL is a private login; do not share.)

Call Details for Traceback #10809 0 seconds ago

Campaign: StudentLoan-Payments-P1
Date/Time: 2022-10-11 22:31:55 +0000 UTC

To: +15869447935 From: +15307371340

Calls to recipients about student loan payment dismissal and/or suspension. Voice-mail message does not identify the calling entity. Evidence suggesting lack of consent, including consumer complaints, honeypot data, and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 429 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 17 Oct 22 15:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/58936 (URL is a private login; do not share.)

Call Details for Traceback #10862 0 seconds ago

Campaign: Discount-Avail50%

Date/Time: 2022-10-15 19:38:43 +0000 UTC

To: +14795025872 From: +13053569999

Calls claiming to be an Internet/TV provider offering 50% discount to recipient. Automated calls to wireless numbers generally not permitted.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 430 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 28 Oct 22 18:40 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/59889 (URL is a private login; do not share.)

Call Details for Traceback #11028 0 seconds ago

Campaign: StudentLoan-\$10,000-Removal
Date/Time: 2022-10-27 22:00:27 +0000 UTC

To: +19083241637 From: +19457770768

Calls to recipients advising their student loan is now eligible for a \$10,000 removal on their account. Recipients may not have student loans. Evidence suggesting lack of consent, including consumer complaints and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 431 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 31 Oct 22 14:56 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/59974 (URL is a private login; do not share.)

Call Details for Traceback #11038 0 seconds ago

 Campaign:
 StudentLoan-\$10,000-Removal

 Date/Time:
 2022-10-28 14:13:27 +0000 UTC

To: +18706270066 From: +16282009162

Calls to recipients advising their student loan is now eligible for a \$10,000/\$20,000 removal on their account. Recipients may not have student loans. Evidence suggesting lack of consent, including consumer complaints and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 432 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 31 Oct 22 14:58 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/59975 (URL is a private login; do not share.)

Call Details for Traceback #11040 0 seconds ago

 Campaign:
 StudentLoan-\$10,000-Removal

 Date/Time:
 2022-10-28 15:40:41 +0000 UTC

To: +15014258332 From: +18454728677

Calls to recipients advising their student loan is now eligible for a \$10,000/\$20,000 removal on their account. Recipients may not have student loans. Evidence suggesting lack of consent, including consumer complaints and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 433 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 31 Oct 22 16:24 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/60006 (URL is a private login; do not share.)

Call Details for Traceback #11042 0 seconds ago

 Campaign:
 StudentLoan-\$10,000-Removal

 Date/Time:
 2022-10-28 15:47:45 +0000 UTC

To: +12293447986 From: +19143357026

Calls to recipients advising their student loan is now eligible for a \$10,000/\$20,000 removal on their account. Recipients may not have student loans. Evidence suggesting lack of consent, including consumer complaints and other information.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 434 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Nov 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

[Redacted], you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
10	1	0	0	0	0	0	2 hours 34 minutes	4

Upstream Summary:

This table shows the providers who you have identified as an upstream provider in response to tracebacks. The chart displays the number of occurrences in which each of those providers is the Point of Entry, Origin, non-responsive, or was unable to find the call. The information presented only includes the tracebacks where you identified the listed providers; the providers may also have appeared in these positions for other tracebacks as well.

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	9	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/providers/provider/summaries/386

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 435 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Nov 22 22:34 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/61007 (URL is a private login; do not share.)

Call Details for Traceback #11232 0 seconds ago

Campaign: Amazon-SuspiciousCharge-P1
Date/Time: 2022-11-10 20:03:03 +0000 UTC

To: +13029301007 From: +13156423312

Calls to wireless numbers impersonating Amazon, claiming suspicious activity on customer's account

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 16 Nov 22 13:50 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

More information about the Industry Traceback Group and the traceback process is available at https://tracebacks.org/the-industry-traceback-group-itg/for-providers/.

Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

- 1. The source of the traffic and the identity of the upstream voice service provider(s) that sent the traffic into your network. If one of your end users originated the traffic, the identity of that end user.
- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/61177 (URL is a private login; do not share.)

Call Details for Traceback #11281 0 seconds ago

Campaign: StudentLoan-ProcessingCenter
Date/Time: 2022-11-15 18:35:15 +0000 UTC

To: +19737807866 From: +16823530811

Calls to recipients from the processing center regarding big changes to the student loan program. Recipients may not have student loans. Evidence suggesting lack of consent, including consumer complaints, honeypot data, and other information. Note FCC 11/4/22 Enforcement Advisory reminded providers to aggressively police unlawful robocalls regarding student loans. According to the Advisory: "These calls typically state that the caller is informing the recipient that the payment suspension will end or that a petition can be filed on their behalf to get a certain amount of their loan 'dismissed.' Some common campaigns purport to be from the 'student loan forgiveness center' or from a state forgiveness center."

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Dec 22 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

[Redacted], you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
2	0	0	0	0	0	0	32 minutes 36 seconds	2

Upstream Summary:

This table shows the providers who you have identified as an upstream provider in response to tracebacks. The chart displays the number of occurrences in which each of those providers is the Point of Entry, Origin, non-responsive, or was unable to find the call. The information presented only includes the tracebacks where you identified the listed providers; the providers may also have appeared in these positions for other tracebacks as well.

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	3	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/providers/provider/summaries/386

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 09 Dec 22 17:41 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do not provide the information via email.

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- 2. If, in investigating the traffic, the end user originating the traffic claims that the traffic complies with applicable U.S. laws and regulations, provide the identity of the end user, a description of the traffic, and the basis of the claim that the traffic complies with U.S. laws and regulations in the portal's comments section.
- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/62742 (URL is a private login; do not share.)

Call Details for Traceback #11540 0 seconds ago

Campaign: Amazon-AuthorizeOrder

Date/Time: 2022-12-07 14:45:01 +0000 UTC

To: +15127794885 From: +15129550991

Calls to wireless numbers impersonating Amazon, calling to authorize an order that was placed.

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 14 Dec 22 14:01 UTC

INDUSTRY TRACEBACK GROUP

We are notifying you that Smart Network Solutions Communications Corp has not yet responded to the request for Traceback #11540.

We encourage you to follow up with Smart Network Solutions Communications Corp to participate in the traceback process.

We can not change results after the traceback has closed.

Please note that FCC regulations require voice service providers to respond fully and in a timely matter to all traceback requests from the Industry Traceback Group, as the designated traceback consortium.

If your upstream provider **Smart Network Solutions Communications Corp** is having trouble accessing the portal please have them contact **support@tracebacks.org**

Review the traceback via our secure on-line portal: https://portal.tracebacks.org/hops/hop/62742 (URL is a private login; do not share.)

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From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Jan 23 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

[Redacted], you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
1	0	0	0	0	0	0	52 minutes 44 seconds	1

Upstream Summary:

This table shows the providers who you have identified as an upstream provider in response to tracebacks. The chart displays the number of occurrences in which each of those providers is the Point of Entry, Origin, non-responsive, or was unable to find the call. The information presented only includes the tracebacks where you identified the listed providers; the providers may also have appeared in these positions for other tracebacks as well.

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Smart Network Solutions Communications Corp	1	0	1	0	0	0

If you have any trouble seeing this email, please visit: https://portal2.tracebacks.org/providers/provider/summaries/386

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 441 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 25 Jan 23 20:47 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

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- 3. Any actions and mitigation steps you have taken on your network to ensure compliance with applicable U.S. laws and regulations and to prevent the suspected illegal traffic from continuing to reach U.S. subscribers.

The Industry Traceback Group believes that every voice service provider has a responsibility to help stop illegal robocalls. Therefore, to the extent that this traceback identifies the originator of these suspicious robocalls, the Industry Traceback Group urges that mitigation efforts be taken at that source. For illegal traffic that goes unmitigated, the ITG may (1) provide information to downstream voice service providers to advise them that suspected illegals on your network continue to be allowed notwithstanding the identification of such calls via the traceback process; and/or (2) advise the appropriate law enforcement agencies of such information so that they can take appropriate action, should they elect to do so.

Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/65421 (URL is a private login; do not share.)

Call Details for Traceback #11970 0 seconds ago

Campaign: Employee-RefundCredits

Date/Time: 2023-01-24 20:48:39 +0000 UTC

To: +12532799944 From: +12186071382

Prerecorded calls suggesting availability of employee refund credit. Caller does not appear to identify the entity responsible for the call, as identified entity does not appear to have any online presence. Prerecorded calls made to wireless numbers as well to numbers on the National Do Not Call Registry apparently without consent or prior relationship. Evidence of high-volume calling and consumer complaints about campaign.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 442 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Feb 23 09:30 UTC

INDUSTRY TRACEBACK GROUP

Monthly Metrics - Smartbiz Telecom, LLC

[Redacted], you can find your organization's traceback-related metrics for the last 30 days below.

Your Summary:

Total Hops	Open	POE	Downstream	Orig	No Resp	Not Found	Avg Response	Campaigns
1	0	0	0	0	0	0	35 minutes 48 seconds	1

Upstream Summary:

This table shows the providers who you have identified as an upstream provider in response to tracebacks. The chart displays the number of occurrences in which each of those providers is the Point of Entry, Origin, non-responsive, or was unable to find the call. The information presented only includes the tracebacks where you identified the listed providers; the providers may also have appeared in these positions for other tracebacks as well.

Provider	Total Hops	Open	POE	Orig	No Resp	Not Found
Telconus / Telcon US / Telcon Voice / Whisl	1	0	0	0	0	0

If you have any trouble seeing this email, please visit: https://portal.tracebacks.org/providers/provider/summaries/386

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 443 of 444

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 01 Feb 23 20:17 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

Your response to this inquiry should be submitted via the Industry Traceback Group's secure online portal. The online portal includes information on any traceback request involving your network, including call detail information of suspicious traffic. For confidentiality and security purposes, provide this information only through the online portal. Do <u>not</u> provide the information via email.

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/65924 (URL is a private login; do not share.)

Call Details for Traceback #12078 0 seconds ago

Campaign: Utility-30MinDisconnect

Date/Time: 2023-01-30 15:21:13 +0000 UTC

To: +19177332656 From: +19174236602

Recorded message says your electric service will be disconnected in 30 to 45 minutes. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.

Case 1:22-cv-23945-JEM Document 50-12 Entered on FLSD Docket 10/16/2023 Page 444 of

From: traceback-notice@tracebacks.org

To: noc@smartbiztel.com, katherine.rosales@smartbiztel.com, eborrero@smartbiztel.com

Date: 02 Feb 23 14:25 UTC

INDUSTRY TRACEBACK GROUP

To Whom It May Concern:

As part of a traceback conducted by the Industry Traceback Group, your network has been identified in the call path for voice traffic that has been deemed suspicious and potentially illegal.

U.S. Federal Communications Commission regulations may legally require your cooperation with this request. Therefore, the Industry Traceback Group requests that you respond to this traceback inquiry as soon as possible, but no later than three business days from now, to assist in identifying the source of this suspected fraudulent, abusive or unlawful network traffic.

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Responding to This Request

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Please feel free to consult with your counsel on this request.

For help or questions, email support@tracebacks.org.

Submit your response via our secure on-line portal: https://portal.tracebacks.org/hops/hop/65957 (URL is a private login; do not share.)

Call Details for Traceback #12079 0 seconds ago

Campaign: Utility-30MinDisconnect

Date/Time: 2023-01-30 15:50:33 +0000 UTC

To: +16237766263 From: +16239994024

Recorded message says your electric service will be disconnected in 30 to 45 minutes. Utility company is not always identified. Assorted toll-free or other numbers used as caller-ID.